

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF MASSACHUSETTS

_____)	
ROUBEN MADIKIANS,)	
Plaintiff,)	
)	
v.)	
)	DOCKET NO. 04-12451-JLT
AMERICAN AIRLINES ASSOCIATION)	
OF PROFESSIONAL FLIGHT)	
ATTENDANTS ("APFA"), et al.,)	
Defendants.)	
_____)	

**ASSENTED TO MOTION TO EXTEND TIME TO RESPOND TO AMENDED
COMPLAINT**

Pursuant to Fed.R.Civ.P. 6(b), defendants American Airlines, Inc. and Kelly Cox, with the consent of the other parties to the above captioned litigation (Association of Professional Flight Attendants, Julia Carrigan, Amy Milenkovic, and Rouben Madikians), hereby request that the Court enter an Order extending time until March 31, 2005, for all defendants to respond to the plaintiff's amended complaint.

1. On or about March 1, 2005, plaintiff Rouben Madikians filed a lawsuit ("Amended Complaint") in this Court against the defendants, seeking damages for allegations of retaliation, defamation, intentional infliction of emotional distress, failure of fair representation, breach of collective bargaining agreement, violation of the Labor Management Relations Act § 301, and discrimination on the basis of sexual orientation.

2. This request is supported by good cause. The moving defendants state that additional time is needed to evaluate the available evidence in this matter, to assess jurisdictional questions, and to conduct further investigation before filing a responsive pleading.

3. Plaintiff's counsel David D. Nielson has assented to an extension of time up to and including March 31, 2005 to file an answer or otherwise respond to plaintiff's complaint.

4. This requested extension of time will not prejudice any party nor will it conflict with any deadline or hearing scheduled by this Court.

5. Inasmuch as the relief sought by the defendants herein is within the sound discretion of the court, no supporting memorandum of law is necessary.

WHEREFORE, defendants American Airlines, Inc. and Kelly Cox respectfully request that the Court:

I. Grant the defendants an extension of time up to and including March 31, 2005, in which to file an answer or other responsive pleading; and

II. Grant the defendants such further relief as the Court finds just and proper.

Respectfully submitted,

**AMERICAN AIRLINES, INC., and
KELLY COX,**
By Their Attorneys,

Assented to by:

ROUBEN MADIKIANS,
By His Attorneys,

/s/ Michael A. Fitzhugh
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/s/ David D. Nielson
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Quincy, MA 02169
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Assented to by:

**ASSOCIATION OF PROFESSIONAL
FLIGHT ATTENDANTS, JULIA
CARRIGAN, AND AMY MILENKOVIC,**
By Their Attorneys,

/s/ John M. West

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CERTIFICATE OF SERVICE

I hereby certify that I filed the above document using the Court's Case Management/Electronic Case Filing system and have served the above document upon all counsel of record pursuant to the *Administrative Procedures Governing the Filing and Service by Electronic Means* on March 11, 2005.

/s/ Angelina Velazquez
Angelina Velazquez